

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

LARRY PHILPOT,

Plaintiff,

- vs -

MEDIA RESEARCH CENTER INC.,

Defendant.

Civil No.: 1:17-cv-00822-TSE-  
MSN

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant, Media Research Center, Inc. (“MRC”), hereby moves for summary judgment, pursuant to Rule 56 of the Federal Rules of Civil Procedure, on the grounds set forth in the accompanying memorandum of law. Upon the entry of summary judgment in MRC’s favor and against Plaintiff, MRC respectfully requests that it be permitted to file a petition for its reasonable attorneys’ fees pursuant to 17 U.S.C. § 505.

Dated: November 1, 2017

Respectfully submitted,

/s/ David A. Warrington

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on November 1, 2017, I electronically filed the foregoing with the Court's CM/ECF system, which will send a copy of the foregoing on the following.

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